

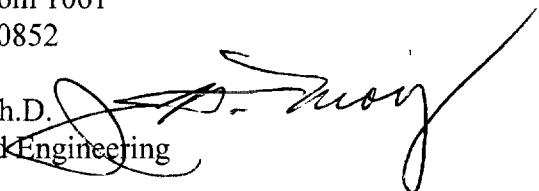
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May 17, 1999

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MEMORANDUM

To: Dockets Management Branch (HFA-305)
Food and Drug Administration, 5630
Fishers Lane, Room 1061
Rockville, MD 20852

From: James H. Moy, Ph.D. 
Professor of Food Engineering

Subject: Labeling of Irradiated Foods

I would like to suggest that the requirement to label all types of irradiated foods in the United States be discontinued.

Consumers are getting better educated about food irradiation. Putting a label on any irradiated food often gives consumers the perception of a warning, and/or gives rise to consumer anxiety.

In 1963, when FDA first approved wheat and wheat flour to be disinfested by irradiation, there did not seem to be a labeling requirement. I recall the requirement came in April 1986 when FDA approved the irradiation of fresh foods for disinfestation and delaying maturation. The initial requirement was for two years. It continued to be extended even though no fresh foods were irradiated for commercial marketing until April 1993 when Hawaii began shipping small quantities of fresh tropical fruits to Illinois and other states for test marketing.

In the past four years, consumers in various parts of the United States have been buying irradiated Hawaiian fruits without fear or concerns about the safety of these irradiated fruits. In every supermarkets where these fruits are sold, however, a large sign was placed above the fruit stand to tell the shoppers that these fruits have been irradiated.

FDA approved the irradiation of poultry and red meat in the interest of consumer safety and protection. I think the industry will soon take advantage of these provisions to benefit consumers and minimize unnecessary food-borne illnesses.

FDA is doing a good job, but the labeling requirement should be discontinued, partly because it has been on the book for 13 years, and partly because there is no need for it. All European countries have considered food irradiation as a process. No other food process in the U.S. requires labeling. There will always be a vocal minority that insists that the label requirement be continued. But their arguments are almost always not based on facts.

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 **VIA AIR MAIL**

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